IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

JOHNNY M. HUNT,	
Plaintiff,	
vs.)	Case No. 3:23-cv-00243
SOUTHERN BAPTIST CONVENTION;)	Judge Richardson
GUIDEPOST SOLUTIONS LLC; and)	Magistrate Judge Frensley
EXECUTIVE COMMITTEE OF THE)	Jury Demand
SOUTHERN BAPTIST CONVENTION,)	
)	
Defendants.	

CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

COME NOW the Parties, Johnny M. Hunt (hereinafter "Plaintiff"), the Southern Baptist Convention (hereinafter the "SBC"), Guidepost Solutions LLC (hereinafter "Guidepost"), and the Executive Committee of the Southern Baptist Convention (hereinafter the "Executive Committee") (hereinafter collectively the "Parties"), by and through their respective counsel, and hereby respectfully submit this Consent Motion for Extension of Time to Respond to Complaint. In support of this Motion, the Parties submit as follows:

- 1. On March 17, 2023, Plaintiff filed his Complaint [D.E. 1].
- On March 17, 2023, counsel for the SBC and the Executive Committee agreed to accept service of process on behalf of the SBC and the Executive Committee via electronic mail in this matter.
- 3. On March 20, 2023, counsel for Guidepost agreed to accept service of process on behalf of Guidepost via electronic mail in this matter, contingent upon an extension of time to file a responsive pleading or other appropriate motion in relation to the Complaint.

4. Plaintiff agreed to Guidepost's requested extension and offered to provide the same

extension to the other Defendants so that all responsive pleadings and/or motions would

be due on or before the same day (May 4, 2023).

5. Defendants have agreed to waive the defense of insufficient service of process in this

matter; provided that the Court grants the requested extension of time up to and

including May 4, 2023, for Defendants to file a responsive pleading or other appropriate

motion in relation to the Complaint.

WHEREFORE, the Parties respectfully request that this Court grant Defendants an

extension of time up to and including May 4, 2023, to file a responsive pleading or other

appropriate motion in relation to Plaintiff's Complaint and deem the defense of insufficient service

of process waived as to all Defendants.

Dated:

March 30, 2023

[SIGNATURE PAGE TO FOLLOW]

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Respectfully Submitted By:

/s/ Scarlett Singleton Nokes (by consent)

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Consent Motion for Extension of Time to Respond to Complaint to be electronically filed with the Clerk of the Court on March 30, 2023, using the CM/ECF system, which will automatically serve all counsel of record listed below:

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